

SEALED

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED JUN 14 2006 CLERK, U.S. DISTRICT COURT By _____ Deputy

UNITED STATES OF AMERICA

§
§
§
§
§

v.

Criminal No.

RAYMOND ANTHONY LARA

1 - 06 CR - 0041C

THE GRAND JURY CHARGES:

Count 1

Conspiracy to Distribute and Possess With Intent to Distribute Methamphetamine
(21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(A)(viii))

Beginning in and around 2004, and continuing through the date of this Indictment, in the Abilene Division of the Northern District of Texas and elsewhere, **Raymond Anthony Lara**, defendant, did unlawfully, knowingly and intentionally, combine, conspire, confederate and agree together and with other persons known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with intent to distribute more than 500 grams of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

MANNER AND MEANS

It was part of this conspiracy that the defendant and other co-conspirators would and did:

1. Organize, manage and otherwise arrange for the acquisition of various quantities of Methamphetamine;
2. Transport or cause others to transport Methamphetamine to and through the Northern District of Texas and elsewhere;
3. Divide, package and distribute Methamphetamine to others for personal use and for further distribution; and,
4. Deliver or cause others to deliver United States currency and other forms of payment for the purchase of Methamphetamine.

OVERT ACTS

In furtherance of the conspiracy and to accomplish the objects of the conspiracy, the defendant and co-conspirators, committed and cause to be committed the following overt acts in the Northern District of Texas and elsewhere:

1. The remaining counts of this indictment are hereby incorporated as overt acts of this conspiracy.

In violation of Title 21, United States Code, Section 846 (841(a)(1) & 841(b)(1)(A)(viii)).

Count 2

Possession With Intent to Distribute Methamphetamine
(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C))

On or about January 14, 2005, in the Abilene Division of the Northern District of Texas and elsewhere, the defendant, **Raymond Anthony Lara**, and others both known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute less than 50 grams of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

Count 3

Possession With Intent to Distribute Cocaine
(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C))

On or about January 14, 2005, in the Abilene Division of the Northern District of Texas and elsewhere, the defendant, **Raymond Anthony Lara**, and others both known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute less than 500 grams of a mixture and substance containing a detectable amount of Cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

Count 4

Possession With Intent to Distribute Methamphetamine
(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B)(viii))

On or about January 28, 2005, in the Abilene Division of the Northern District of Texas and elsewhere, the defendant, **Raymond Anthony Lara**, and others both known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute more than 50 grams of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii) and Title 18, United States Code, Section 2.

Count 5

Possession With Intent to Distribute Cocaine
(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C))

On or about January 28, 2005, in the Abilene Division of the Northern District of Texas and elsewhere, the defendant, **Raymond Anthony Lara**, and others both known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute less than 500 grams of a mixture and substance containing a detectable amount of Cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

Count 6

Possession of a Firearm in Furtherance of Drug Trafficking Crimes
(18 U.S.C. §§ 924(c) and 2)

On or about January 28, 2005, in the Abilene Division of the Northern District of Texas and elsewhere, the defendant, **Raymond Anthony Lara**, did knowingly and intentionally possess a firearm, to wit: a loaded Glock, Model 22, .40 caliber semi-automatic handgun bearing serial number BND119, in furtherance of drug trafficking crimes, that is, Conspiracy (as charged in Count 1 of this Indictment), Possession With Intent to Distribute Methamphetamine (as charged in Count 4 of this Indictment) and Possession With Intent to Distribute Cocaine (as charged in Count 5 of this Indictment) in violation of Title 21, United States Code, §§ 846 and 841(a)(1), offenses for which he may be prosecuted in a court of the United States.

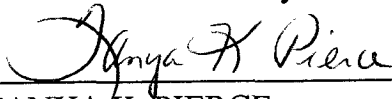
In violation of Title 18, United States Code, Sections 924(c) and 2.

A TRUE BILL

FOREPERSON

REDACTED

RICHARD B. ROPER
United States Attorney



TANYA K. PIERCE

Assistant United States Attorney
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Fax: 806.472.7259

UNITED STATES DISTRICT COURT

SEAL

v.

Raymond Anthony Lara

INDICTMENT

21 USC 846

CONSPIRACY

21 USC 841(a)(1) & 841(b)(1)(B)(viii) & 841(b)(1)(C) & 18 USC 2
POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
AND AIDING AND ABETTING

21 USC 841(a)(1) & 841(b)(1)(C) and 18 USC 2
POSSESSION WITH INTENT TO DISTRIBUTE COCAINE AND
AIDING AND ABETTING

18 USC 924(c) & 2
POSSESSION OF A FIREARM IN FURTHERANCE OF
DRUG TRAFFICKING CRIMES AND AIDING AND ABETTING

(SIX COUNTS)

REDACTED

A True Bill rendered:

Lubbock

Filed in open court this 14th day of June 2006

Clerk

WARRANT TO ISSUE

UNITED STATES MAGISTRATE JUDGE